

# EXHIBIT A

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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THELMA JONES, PRIYIA LACEY, FAISA  
ABDI, ALI ALI, RUKIYA HUSSEIN, LUCIA  
PORRAS, DAVID TROTTER-FORD, AND  
SOMALI COMMUNITY RESETTLEMENT  
SERVICES, INC.,

Case: 18-cv-1643 (JRT/HB)

Plaintiffs,

v.

CITY OF FARIBAULT,

Defendant.

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**DEFENDANT'S PRIVILEGE LOG**

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TO: **PLAINTIFFS** above named, and their counsel of record, Alejandro Ortiz, Joshua David Riegel, Rachel Goodman, American Civil Liberties Union Foundation, 125 Broad St., 18th Floor, New York, NY 10004; Teresa Nelson, Ian Bratlie, American Civil Liberties Union of Minnesota, P.O. Box 14720, Minneapolis, MN 55414.

**PLEASE TAKE NOTICE** that, pursuant to Rule 26 of the Federal Rules of Civil Procedure, Defendant City of Faribault provides the following description of the documents, communications, and tangible things not produced or disclosed due to its designation as privileged or subject to protection. Defendant reserves the right to supplement this document as discovery continues.

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	12/6/2013 14:46	Dave Mathews	Melissa J. Manderschied; Brian J. Anderson; Peter Waldock; Andy Bohlen; Al Ernste		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Melissa J. Manderschied) <sup>i</sup>	WITHHELD 0083906
Email Attachment	3/7/2014 9:19	Melissa J. Manderschied	Brian J. Anderson;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Melissa J. Manderschied) <sup>i</sup>	WITHHELD 0083959
Email Attachment	3/7/2014 9:19	Melissa J. Manderschied	Brian J. Anderson;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Melissa J. Manderschied) <sup>i</sup>	WITHHELD 0083991
Email Attachment	3/7/2014 9:19	Melissa J. Manderschied	Brian J. Anderson;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Melissa J. Manderschied) <sup>i</sup>	WITHHELD 0247867

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	3/10/2014 11:39	Brian Anderson	Andy Bohlen; Peter Waldock		Attorney-Client Privileged Communication	Privilege regarding confidential communications between attorney and client extends to intermediaries and agents through whom communications are made. <sup>ii</sup>	WITHHELD 0083990
Email Message	3/10/2014 12:35	Andy Bohlen	Doug Delesha; Mark Krenik		Attorney-Client Privileged Communication	Privilege regarding confidential communications between attorney and client extends to intermediaries and agents through whom communications are made. <sup>ii</sup>	WITHHELD 0247866

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	3/12/2014 8:51	Mark Krenik	Andy Bohlen		Attorney-Client Privileged Communication	Privilege regarding confidential communications between attorney and client extends to intermediaries and agents through whom communications are made. <sup>ii</sup>	WITHHELD 0083958
Email Message	3/12/2014 9:17	Andy Bohlen	Mark Krenik	Doug Delesha	Attorney-Client Privileged Communication	Privilege regarding confidential communications between attorney and client extends to intermediaries and agents through whom communications are made. <sup>ii</sup>	WITHHELD 0247822
Email Attachment	3/13/2014 9:41	Dave Mathews	Melissa J. Manderschied; Brian J. Anderson; Peter Waldock; Andy Bohlen; Al Ernste		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Melissa J. Manderschied) <sup>i</sup>	WITHHELD 0083905

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	3/13/2014 9:48	Dave Mathews	Melissa J. Manderschied; Brian J. Anderson; Peter Waldock; Andy Bohlen; Al Ernste		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Melissa J. Manderschied) <sup>i</sup>	WITHHELD 0083904
Email Attachment	3/13/2014 13:01	Melissa J. Manderschied	Dave Mathews; Brian J. Anderson; Peter Waldock; Andy Bohlen; Al Ernste	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Melissa J. Manderschied; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0083901
Email Attachment	3/13/2014 13:01	Melissa J. Manderschied	Dave Mathews; Brian J. Anderson; Peter Waldock; Andy Bohlen; Al Ernste	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Melissa J. Manderschied; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0083900
Email Message	3/13/2014 13:01	Melissa J. Manderschied	Dave Mathews; Brian J. Anderson; Peter Waldock; Andy Bohlen; Al Ernste	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Melissa J. Manderschied; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0083899

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	5/1/2014 10:22	Dave Mathews	Brian J. Anderson; Scott J. Riggs;	Peter Waldock; Andy Bohlen; Melissa J. Manderschied;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Melissa J. Manderschied) <sup>i</sup>	WITHHELD 0083933
Email Message	5/1/2014 10:58	Dave Mathews	Brian J. Anderson; Scott J. Riggs;	Peter Waldock; Andy Bohlen; Melissa J. Manderschied;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Melissa J. Manderschied) <sup>i</sup>	WITHHELD 0083932
Email Message	5/1/2014 16:15	Dave Mathews	Brian J. Anderson; Scott J. Riggs;	Peter Waldock; Andy Bohlen; Melissa J. Manderschied;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Melissa J. Manderschied) <sup>i</sup>	WITHHELD 0083922
Email Message	11/19/2014 12:13	Robert A. Alsop	Kevin Bushard;	Scott J. Riggs; Jean M. Short; Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0099238

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/Control Number
Email Attachment	3/17/2015 16:08	Jean M. Short	Julie Fleming-Wolfe;	Mark Rossow; Brian J. Anderson; Andy Bohlen; Robert A. Alsop; Scott J. Riggs	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Jean M. Short; Julie Fleming-Wolfe; Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0098127
Email Attachment	3/17/2015 16:08	Kevin Bushard	Robert A. Alsop; Andy Bohlen; Brian J. Anderson;	Scott J. Riggs;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0098159
Email Message	5/21/2015 14:27	Joe Van Thomme	Marty Smith; Deanna Kuennen; Al Erneste	Tom Weidner	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Joe Van Thomme; Tom Weidner) <sup>i</sup>	WITHHELD 02012015E16
Email Attachment	7/20/2015 14:43	Andy Bohlen	Scott J. Riggs;	Janice Bestul; Jason Severson; Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs) <sup>i</sup>	WITHHELD 0099173
Email Attachment	8/27/2015 11:06	Robert A. Alsop	Mark Krenik;	Andy Bohlen; Scott J. Riggs;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0057997



Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	9/1/2015 15:45	Scott J. Riggs	Carole Dillerud;	Scott J. Riggs; Robert A. Alsop; Brian J. Anderson; Andy Bohlen; Mark Krenik	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Scott J. Riggs; Scott J. Riggs; Robert A. Alsop) <sup>i</sup>	WITHHELD 0058038
Email Attachment	9/2/2015 11:06	Robert A. Alsop	Brian J. Anderson; Andy Bohlen; Mark Krenik; Carole Dillerud	Scott J. Riggs;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0058017
Email Attachment	9/3/2015 16:25	Kim Clausen	Robert A. Alsop; Scott J. Riggs;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0273821
Email Attachment	9/3/2015 16:25	Kim Clausen	Robert A. Alsop; Scott J. Riggs;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0289124
Email Attachment	9/3/2015 16:25	Kim Clausen	Robert A. Alsop; Scott J. Riggs;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0292799

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	9/8/2015 14:03	Robert A. Alsop	Mark Krenik;	Scott J. Riggs; Jean M. Short; Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0058029
Email Attachment	9/15/2015 18:19	Jean M. Short	Brian J. Anderson; Andy Bohlen; Jason Severson;	Scott J. Riggs; Robert A. Alsop;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Jean M. Short; Scott J. Riggs; Robert A. Alsop) <sup>i</sup>	WITHHELD 0099166
Correspondence	9/17/2015	Marty Smith	Joe Van Thomme; Tom Weidner		Attorney-Client Privileged Communication	Confidential communication with City Attorney (Joe Van Thomme; Tom Weidner) <sup>i</sup>	WITHHELD 02012015E14
Email Message	12/14/2015 14:59	Marty Smith	Joe Van Thomme	Deanna Kuennen; Al Erneste	Attorney-Client Privileged Communication	Confidential communication with City Attorney (Joe Van Thomme) <sup>i</sup>	WITHHELD 02012015E12
Email Message	1/22/2016 11:26	Marty Smith	Joe Van Thomme	Al Erneste	Attorney-Client Privileged Communication	Confidential communication with City Attorney (Joe Van Thomme) <sup>i</sup>	WITHHELD 02012015E10

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	1/26/2016 16:37	Al Erneste	Sarah J. Sonsalla; Deanna Kuennen; Steven Messick; Marty Smith	Sandi Tidemann	Attorney-Client Privileged Communication	Confidential communication with City Attorney (Sarah J. Sonsalla) <sup>i</sup>	WITHHELD 02012015E8
Email Message	1/27/2016 8:15	Marty Smith	Joe Van Thomme		Attorney-Client Privileged Communication	Confidential communication with City Attorney (Joe Van Thomme) <sup>i</sup>	WITHHELD 02012015E6
Email Message	3/23/2016 13:07	Joe Van Thomme	Marty Smith	Al Erneste	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Joe Van Thomme) <sup>i</sup>	WITHHELD 02012015E4
Email Message	5/4/2016 12:02	Joe Van Thomme	Scott J. Riggs	Jean M. Short; Marty Smith; Deanna Kuennen	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Joe Van Thomme; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 02012015E2

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	7/18/2016 16:48	Marty Smith	Deanna Kuennen; David Wanberg; Peter Waldock		Attorney-Client Privileged Communication	Privilege regarding confidential communications between attorney and client extends to intermediaries and agents through whom communications are made. <sup>ii</sup>	WITHHELD 02022016K2
Email Attachment	11/18/2016 11:52	Deanna Kuennen	Scott J. Riggs; Robert A. Alsop;	Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Robert A. Alsop; Jean M. Short) <sup>i</sup>	WITHHELD 0191623
Email Message	12/15/2016 14:29	Deanna Kuennen	Scott J. Riggs; Robert A. Alsop;	Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Robert A. Alsop; Jean M. Short) <sup>i</sup>	WITHHELD 0191622
Email Message	12/16/2016 11:18	Robert A. Alsop	Deanna Kuennen; Scott J. Riggs;	Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0191620

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	12/30/2016 16:32	Deanna Kuennen	Scott J. Riggs;	Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0195049
Email Message	1/11/2017 16:10	Deanna Kuennen	Robert A. Alsop; Scott J. Riggs;	Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0191626
Email Message	1/11/2017 16:36	Robert A. Alsop	Deanna Kuennen; Scott J. Riggs;	Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0191624
Email Message	1/18/2017 14:17	Jean M. Short	Andy Bohlen;	Deanna Kuennen; Scott J. Riggs; Robert A. Alsop;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Jean M. Short; Scott J. Riggs; Robert A. Alsop) <sup>i</sup>	WITHHELD 0057864
Email Message	1/20/2017 12:53	Mark Krenik	Andy Bohlen; Jason Severson; Neal Pederson;	Robert A. Alsop; Doug Delesha;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0057865

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	1/23/2017 16:09	Deanna Kuennen	Scott J. Riggs;	Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0195051
Email Message	2/1/2017 16:54	Deanna Kuennen	Robert A. Alsop; Scott J. Riggs;	Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0191625
Email Message	2/3/2017 11:57	Robert A. Alsop	Deanna Kuennen; Scott J. Riggs;	Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0191621
Email Attachment	2/20/2017 16:25	Scott J. Riggs	Brian J. Anderson;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Scott J. Riggs) <sup>i</sup>	WITHHELD 0001977
Email Attachment	2/20/2017 16:25	Scott J. Riggs	Brian J. Anderson;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Scott J. Riggs) <sup>i</sup>	WITHHELD 0032974

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	3/6/2017 16:52	Marty Smith	Craig Deuth	Rebecca Christensen; Joe Van Thomme	Attorney-Client Privileged Communication	Communication to City Attorney (Rebecca Christensen; Joe Van Thomme) for purpose of procuring legal advice. <sup>i</sup>	WITHHELD 0302035
Email Message	3/7/2017 10:36	Deanna Kuennen	Scott J. Riggs; Robert A. Alsop;	Jean M. Short; Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Robert A. Alsop; Jean M. Short) <sup>i</sup>	WITHHELD 0057843
Email Message	3/7/2017 13:13	Robert A. Alsop	Deanna Kuennen; Scott J. Riggs;	Jean M. Short; Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0191614
Email Message	3/7/2017 15:24	Deanna Kuennen	Robert A. Alsop; Scott J. Riggs;	Jean M. Short; Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	Privileged 020-022

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	3/7/2017 17:45	Mark Krenik	Andy Bohlen		Attorney-Client Privileged Communication	Thread contains confidential attorney-client privileged communication. <sup>i</sup>	WITHHELD 0295563
Email Message	3/8/2017 15:19	Mark Krenik	Andy Bohlen		Attorney-Client Privileged Communication	Thread contains confidential attorney-client privileged communication. <sup>i</sup>	Privileged 017-019
Email Message	3/27/2017 13:23	Robert A. Alsop	Andy Bohlen; Deanna Kuennen; Mark Krenik; Scott J. Riggs		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0057834
Email Message	3/28/2017 10:13	Deanna Kuennen	Jean M. Short; Scott J. Riggs;	David Wanberg; Andy Bohlen; Tim Murray;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Jean M. Short; Scott J. Riggs) <sup>i</sup>	WITHHELD 0057826
Email Message	3/28/2017 10:13	Deanna Kuennen	Jean M. Short; Scott J. Riggs;	Dave Wanberg; Andy Bohlen; Tim Murray;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Jean M. Short; Scott J. Riggs) <sup>i</sup>	WITHHELD 0195044
Email Message	3/28/2017 10:16	Deanna Kuennen	Jean M. Short; Scott J. Riggs;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Jean M. Short; Scott J. Riggs) <sup>i</sup>	WITHHELD 0195043



Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	3/28/2017 13:09	Doug Delesha	Andy Bohlen; Joe Van Thomme;	Mark Krenik; John Gramling;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Joe Van Thomme) <sup>i</sup>	WITHHELD 0057825
Email Message	3/28/2017 13:35	Joe Van Thomme	Doug Delesha;	Andy Bohlen; Mark Krenik; John Gramling;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Joe Van Thomme) <sup>i</sup>	WITHHELD 0214295
Email Message	4/7/2017 16:48	Brian Anderson	Deanna Kuennen		Attorney-Client Privileged Communication	Privilege regarding confidential communications between attorney and client extends to intermediaries and agents through whom communications are made. <sup>ii</sup>	WITHHELD 0196752
Email Message	4/7/2017 16:55	Deanna Kuennen	Robert A. Alsop; Scott J. Riggs;	Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0203389

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	4/10/2017 10:01	Deanna Kuennen	Robert A. Alsop;	Andy Bohlen; Scott J. Riggs; Jean M. Short; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057788
Email Message	4/12/2017 18:53	Deanna Kuennen	Andy Bohlen		Attorney-Client Privileged Communication	Thread contains confidential attorney-client privileged communication. <sup>i</sup>	Privileged 007-009
Email Message	4/13/2017 10:22	Andy Bohlen	Deanna Kuennen		Attorney-Client Privileged Communication	Thread contains confidential attorney-client privileged communication. <sup>i</sup>	Privileged 003-006
Email Message	4/14/2017 10:05	Mark Krenik	Andy Bohlen		Attorney-Client Privileged Communication	Thread contains confidential attorney-client privileged communication. <sup>i</sup>	Privileged 010-013
Email Message	4/14/2017 10:55	Andy Bohlen	Deanna Kuennen;	Robert A. Alsop; Mark Krenik; Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0057818
Email Message	4/14/2017 11:05	Deanna Kuennen	Robert A. Alsop; Andy Bohlen;	Mark Krenik; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0299730

<b>Record Type</b>	<b>Date/Time</b>	<b>From</b>	<b>To</b>	<b>Other Recipients</b>	<b>Designation</b>	<b>Designation Notes</b>	<b>Bates Label/ Control Number</b>
Email Message	4/14/2017 11:12	Robert A. Alsop	Deanna Kuennen; Andy Bohlen;	Mark Krenik; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0299728
Email Message	4/14/2017 13:32	Andy Bohlen	Robert A. Alsop; Deanna Kuennen;	Mark Krenik; Marty Smith; Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0057817
Email Message	4/17/2017 18:18	Mark Krenik	Robert A. Alsop;	Andy Bohlen; Doug Delesha;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0057811
Email Message	4/17/2017 20:57	Doug Delesha	Mark Krenik;	Robert A. Alsop; Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0057822
Email Message	4/17/2017 20:57	Doug Delesha	Mark Krenik;	Robert A. Alsop; Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0220919

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	4/18/2017 12:07	Robert A. Alsop	Deanna Kuennen; Andy Bohlen; Mark Krenik; Marty Smith	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057821
Email Message	4/18/2017 12:07	Robert A. Alsop	Deanna Kuennen; Andy Bohlen;	Mark Krenik; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0299696
Email Message	4/18/2017 14:22	Robert A. Alsop	Deanna Kuennen; Andy Bohlen; Mark Krenik; Marty Smith	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057820
Email Message	5/3/2017 11:04	Deanna Kuennen	Robert A. Alsop; Scott J. Riggs;	Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0057808
Email Message	5/3/2017 20:38	Robert A. Alsop	Deanna Kuennen; Scott J. Riggs;	Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0057800

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	5/8/2017 9:56	Robert A. Alsop	Deanna Kuennen;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0191609
Email Attachment	5/8/2017 9:56	Robert A. Alsop	Deanna Kuennen;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0299650
Email Attachment	5/8/2017 10:18	Robert A. Alsop	Deanna Kuennen; Marty Smith; Andy Bohlen; Mark Krenik	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057803
Email Message	5/8/2017 10:18	Robert A. Alsop	Deanna Kuennen; Marty Smith; Andy Bohlen; Mark Krenik	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057804
Email Message	5/8/2017 10:38	Robert A. Alsop	Deanna Kuennen; Marty Smith; Andy Bohlen; Mark Krenik	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057802

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	5/9/2017 8:03	Mark Krenik	Robert A. Alsop;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0295231
Email Attachment	5/9/2017 10:43	Kim Clausen	Scott J. Riggs; Jean M. Short;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0269576
Email Message	5/9/2017 15:42	Deanna Kuennen	Robert A. Alsop; Marty Smith; Andy Bohlen; Mark Krenik	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057791
Email Message	5/9/2017 15:47	Mark Krenik	Andy Bohlen		Attorney-Client Privileged Communication	Privilege regarding confidential communications between attorney and client extends to intermediaries and agents through whom communications are made. <sup>ii</sup>	WITHHELD 0295194

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	5/10/2017 13:28	Mark Krenik	Robert A. Alsop;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0295183
Email Message	5/10/2017 13:37	Marty Smith	Deanna Kuennen		Attorney-Client Privileged Communication	Attorney-Client Privilege applies to communications, which due to cumulative effect of log and already produced materials, would allow opposing party to discover the topic or contents of a privileged communication. <sup>iii</sup>	WITHHELD 0302979

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	5/10/2017 14:54	Deanna Kuennen	Marty Smith		Attorney-Client Privileged Communication	Attorney-Client Privilege applies to communications, which due to cumulative effect of log and already produced materials, would allow opposing party to discover the topic or contents of a privileged communication. iii	WITHHELD 0299642



Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	5/10/2017 15:14	Marty Smith	Deanna Kuennen		Attorney-Client Privileged Communication	Attorney-Client Privilege applies to communications, which due to cumulative effect of log and already produced materials, would allow opposing party to discover the topic or contents of a privileged communication. iii	WITHHELD 0302978
Email Message	5/11/2017 10:25	Mark Krenik	Andy Bohlen; Robert A. Alsop; Deanna Kuennen; Marty Smith; Scott J. Riggs		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0057806
Email Attachment	5/11/2017 10:26	Mark Krenik	Andy Bohlen; Robert A. Alsop; Deanna Kuennen; Marty Smith; Scott J. Riggs		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0057807

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	5/11/2017 14:05	Robert A. Alsop	Deanna Kuennen; Marty Smith; Andy Bohlen; Mark Krenik	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057797
Email Message	5/11/2017 14:10	Robert A. Alsop	Deanna Kuennen; Marty Smith; Andy Bohlen; Mark Krenik	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057796
Email Message	5/11/2017 14:13	Andy Bohlen	Robert A. Alsop; Deanna Kuennen; Marty Smith; Mark Krenik	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0299630
Email Attachment	5/11/2017 16:17	Robert A. Alsop	Deanna Kuennen; Marty Smith; Andy Bohlen; Mark Krenik	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0191616

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	5/11/2017 16:26	Robert A. Alsop	Deanna Kuennen; Marty Smith; Andy Bohlen; Mark Krenik	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0191615
Email Message	5/11/2017 16:39	Deanna Kuennen	Robert A. Alsop; Marty Smith; Andy Bohlen; Mark Krenik	Scott J. Riggs; Jean M. Short; Carole Dillerud;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0299628
Email Message	5/12/2017 8:10	Marty Smith	Robert A. Alsop; Deanna Kuennen; Andy Bohlen; Mark Krenik	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057795
Email Message	5/12/2017 8:14	Robert A. Alsop	Marty Smith; Deanna Kuennen; Andy Bohlen; Mark Krenik	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0299647

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	5/12/2017 8:44	Robert A. Alsop	Carole Dillerud; Deanna Kuennen; Marty Smith; Andy Bohlen; Mark Krenik	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057794
Email Attachment	5/12/2017 8:44	Robert A. Alsop	Carole Dillerud; Deanna Kuennen; Marty Smith; Andy Bohlen; Mark Krenik	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057793
Email Message	5/12/2017 8:44	Robert A. Alsop	Carole Dillerud; Deanna Kuennen; Marty Smith; Andy Bohlen; Mark Krenik	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057792
Email Message	5/12/2017 8:57	Deanna Kuennen	Robert A. Alsop; Carole Dillerud; Marty Smith; Andy Bohlen; Mark Krenik	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0299646

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	5/12/2017 11:54	Deanna Kuennen	Robert A. Alsop;	Andy Bohlen; Scott J. Riggs; Jean M. Short; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057789
Email Attachment	5/12/2017 12:19	Deanna Kuennen	Robert A. Alsop;	Andy Bohlen; Scott J. Riggs; Jean M. Short; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057790
Email Message	5/16/2017 8:22	Deanna Kuennen	Robert A. Alsop;	Andy Bohlen; Scott J. Riggs; Jean M. Short; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057787
Email Message	5/17/2017 10:26	Robert A. Alsop	Deanna Kuennen;	Scott J. Riggs; Jean M. Short; Andy Bohlen; Mark Krenik;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0191613
Email Message	5/17/2017 11:09	Deanna Kuennen	Robert A. Alsop;	Scott J. Riggs; Jean M. Short; Andy Bohlen; Mark Krenik; Marty Smith	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057801

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	5/31/2017 16:44	Deanna Kuennen	Andy Bohlen;	Robert A. Alsop; Scott J. Riggs; Jean M. Short; Mark Krenik; Marty Smith	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057782
Email Message	6/13/2017 8:58	Deanna Kuennen	Robert A. Alsop;	Scott J. Riggs; Jean M. Short; Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0203253
Email Message	6/15/2017 8:18	Robert A. Alsop	Deanna Kuennen;	Scott J. Riggs; Jean M. Short; Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057781
Email Message	6/19/2017 8:45	Deanna Kuennen	Brian J. Anderson;	Robert A. Alsop; Scott J. Riggs; Jean M. Short; Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0196684

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	6/19/2017 9:18	Andy Bohlen	Deanna Kuennen; Brian J. Anderson;	Robert A. Alsop; Scott J. Riggs; Jean M. Short; Mark Krenik; Jason Severson; Andy Bohlen	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057779
Email Attachment	6/22/2017 8:45	Deanna Kuennen	Scott J. Riggs;	Jean M. Short; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0301959
Email Message	6/26/2017 14:50	Deanna Kuennen	Scott J. Riggs;	Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0195042
Email Message	6/27/2017 10:03	Mark Krenik	Robert A. Alsop;	Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0057775
Email Message	6/27/2017 10:25	Mark Krenik	Robert A. Alsop;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0295028

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	6/27/2017 12:13	Deanna Kuennen	Robert A. Alsop;	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0191612
Email Message	7/18/2017 6:44	Deanna Kuennen	Robert A. Alsop;	Scott J. Riggs; Jean M. Short; Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057768
Email Message	7/18/2017 12:13	Andy Bohlen	Robert A. Alsop;	Mark Krenik; Jason Severson; Deanna Kuennen; Marty Smith; Andy Bohlen	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0057770
Email Message	7/19/2017 8:38	Deanna Kuennen	Robert A. Alsop; Andy Bohlen;	Marty Smith; Mark Krenik; Scott J. Riggs; Jean M. Short; Brian J. Anderson	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057769
Email Message	7/19/2017 9:50	Andy Bohlen	Deanna Kuennen; Robert A. Alsop;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0102102



Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	7/20/2017 10:52	Robert A. Alsop	Mark Krenik; Andy Bohlen;	Jason Severson; Deanna Kuennen; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0057763
Email Message	7/20/2017 10:55	Mark Krenik	Robert A. Alsop; Andy Bohlen;	Jason Severson; Deanna Kuennen; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0057762
Email Message	7/21/2017 10:43	Mark Krenik	Andy Bohlen;	Robert A. Alsop; Brian J. Anderson; Wendy Murphy;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Wendy Murphy) <sup>i</sup>	WITHHELD 0057767
Email Message	7/21/2017 11:36	Robert A. Alsop	Mark Krenik; Andy Bohlen;	Brian J. Anderson; Wendy Murphy;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Wendy Murphy) <sup>i</sup>	WITHHELD 0057766
Email Message	7/27/2017 10:25	David T. Anderson	Deanna Kuennen;	Jean M. Short; Scott J. Riggs;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (David T. Anderson; Jean M. Short; Scott J. Riggs) <sup>i</sup>	WITHHELD 0186513

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	7/30/2017 19:45	Deanna Kuennen	Brian J. Anderson; Andy Bohlen; Marty Smith;	Robert A. Alsop;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0102687
Email Message	8/1/2017 6:46	Robert A. Alsop	Mark Krenik;	Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0057758
Email Message	8/3/2017 9:44	Robert A. Alsop	Deanna Kuennen;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0191590
Email Message	8/7/2017 7:47	Mark Krenik	Wendy Murphy;	Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Wendy Murphy) <sup>i</sup>	WITHHELD 0057757
Email Message	8/7/2017 7:47	Mark Krenik	Robert A. Alsop;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0294663
Email Attachment	8/9/2017 8:17	Robert A. Alsop	Deanna Kuennen;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0191580

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	8/10/2017 12:55	Cathy A. Rekuski	Deanna Kuennen; Carole Dillerud;	Robert A. Alsop;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Cathy A. Rekuski; Robert A. Alsop) i	WITHHELD 0191593
Email Attachment	8/10/2017 12:55	Cathy A. Rekuski	Deanna Kuennen; Carole Dillerud;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Cathy A. Rekuski) i	WITHHELD 0300667
Email Message	8/10/2017 14:21	Robert A. Alsop	Andy Bohlen; Mark Krenik;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop) i	WITHHELD 0057750
Email Message	8/11/2017 11:26	Cathy A. Rekuski	Deanna Kuennen; Carole Dillerud;	Robert A. Alsop;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Cathy A. Rekuski; Robert A. Alsop) i	WITHHELD 0191592

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	8/11/2017 11:59	Deanna Kuennen	Marty Smith		Attorney-Client Privileged Communication	Privilege regarding confidential communications between attorney and client extends to intermediaries and agents through whom communications are made. <sup>ii</sup>	WITHHELD 0300666
Email Message	8/14/2017 13:30	Mark Krenik	Robert A. Alsop;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0294782
Email Message	8/14/2017 14:17	Mark Krenik	Robert A. Alsop;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0294776
Email Message	8/15/2017 8:55	Andy Bohlen	Mark Krenik; Wendy Murphy;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Wendy Murphy) <sup>i</sup>	WITHHELD 0103359

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	8/15/2017 8:58	Mark Krenik	Andy Bohlen		Attorney-Client Privileged Communication	Privilege regarding confidential communications between attorney and client extends to intermediaries and agents through whom communications are made. <sup>ii</sup>	WITHHELD 0103366
Email Message	8/15/2017 9:05	Wendy Murphy	Andy Bohlen; Mark Krenik;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Wendy Murphy) <sup>i</sup>	WITHHELD 0103372
Email Message	8/15/2017 9:15	Andy Bohlen	Wendy Murphy; Mark Krenik;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Wendy Murphy) <sup>i</sup>	WITHHELD 0103395
Email Message	8/15/2017 9:16	Mark Krenik	Andy Bohlen; Wendy Murphy;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Wendy Murphy) <sup>i</sup>	WITHHELD 0103406

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	8/15/2017 9:46	Mark Krenik	Andy Bohlen		Attorney-Client Privileged Communication	Privilege regarding confidential communications between attorney and client extends to intermediaries and agents through whom communications are made. <sup>ii</sup>	WITHHELD 0057742
Email Message	8/15/2017 10:02	Mark Krenik	Robert A. Alsop;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0294707
Email Message	8/16/2017 6:01	Deanna Kuennen	Robert A. Alsop;	Scott J. Riggs; Tim Murray; Andy Bohlen; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0057748
Email Message	8/16/2017 6:23	Robert A. Alsop	Deanna Kuennen;	Scott J. Riggs; Tim Murray; Andy Bohlen; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0057746

<b>Record Type</b>	<b>Date/Time</b>	<b>From</b>	<b>To</b>	<b>Other Recipients</b>	<b>Designation</b>	<b>Designation Notes</b>	<b>Bates Label/ Control Number</b>
Email Message	8/16/2017 6:48	Deanna Kuennen	Robert A. Alsop;	Scott J. Riggs; Tim Murray; Andy Bohlen; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0103679
Email Message	8/16/2017 6:54	Robert A. Alsop	Deanna Kuennen;	Scott J. Riggs; Tim Murray; Andy Bohlen; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0103421
Email Message	8/16/2017 7:13	Deanna Kuennen	Tim Murray; Robert A. Alsop;	Scott J. Riggs;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0202660
Email Message	8/16/2017 7:59	Andy Bohlen	Mark Krenik		Attorney-Client Privileged Communication	Privilege regarding confidential communications between attorney and client extends to intermediaries and agents through whom communications are made. <sup>ii</sup>	WITHHELD 0103471

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	8/16/2017 8:47	Deanna Kuennen	Mayor & City Council;	Tim Murray; Robert A. Alsop; Scott J. Riggs; Jean M. Short; Andy Bohlen	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0001748
Email Attachment	8/16/2017 8:47	Robert A. Alsop	Deanna Kuennen;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0191578
Email Attachment	8/16/2017 8:47	Robert A. Alsop	Deanna Kuennen;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0300651
Email Message	8/16/2017 10:02	Robert A. Alsop	Andy Bohlen; Mark Krenik;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0103596
Email Message	8/16/2017 10:04	Robert A. Alsop	Deanna Kuennen;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0191577
Email Message	8/16/2017 10:28	Mark Krenik	Robert A. Alsop; Andy Bohlen;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0103630



Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	8/16/2017 13:15	Deanna Kuennen	Mayor & City Council;	Tim Murray; Robert A. Alsop; Scott J. Riggs; Jean M. Short; Andy Bohlen	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0001747
Email Message	8/16/2017 13:15	Deanna Kuennen	Marty Smith		Attorney-Client Privileged Communication	Privilege regarding confidential communications between attorney and client extends to intermediaries and agents through whom communications are made. <sup>ii</sup>	WITHHELD 0300650
Email Message	8/18/2017 15:04	Deanna Kuennen	Robert A. Alsop;	Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0103699
Email Message	8/18/2017 15:21	Robert A. Alsop	Deanna Kuennen;	Andy Bohlen;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0103720

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	8/18/2017 15:25	Andy Bohlen	Robert A. Alsop; Deanna Kuennen;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0103733
Email Message	8/24/2017 8:03	Tim Murray	Scott J. Riggs; Jean M. Short;	Andy Bohlen; Deanna Kuennen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057736
Email Message	8/24/2017 8:37	Andy Bohlen	Tim Murray; Scott J. Riggs; Jean M. Short; Janice Bestul	Deanna Kuennen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0104182
Email Message	8/24/2017 9:25	Deanna Kuennen	Andy Bohlen; Tim Murray; Scott J. Riggs; Jean M. Short; Janice Bestul		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0104207
Email Message	8/24/2017 11:02	Andy Bohlen	Deanna Kuennen; Tim Murray; Scott J. Riggs; Jean M. Short; Janice Bestul		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0104044
Email Message	8/24/2017 11:04	Tim Murray	Andy Bohlen	Deanna Kuennen	Attorney-Client Privileged Communication	Thread contains confidential attorney-client privileged communication. <sup>i</sup>	Privileged 001-002

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	8/24/2017 11:28	Andy Bohlen	Tim Murray	Deanna Kuennen	Attorney-Client Privileged Communication	Thread contains confidential attorney-client privileged communication. <sup>i</sup>	Privileged 014-016
Email Message	8/30/2017 10:26	Deanna Kuennen	Robert A. Alsop;	Andy Bohlen; Marty Smith; Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057735
Email Message	8/30/2017 10:36	Robert A. Alsop	Deanna Kuennen;	Andy Bohlen; Marty Smith; Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0104453
Email Message	8/30/2017 11:14	Deanna Kuennen	Robert A. Alsop;	Andy Bohlen; Marty Smith; Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0104480
Email Message	8/30/2017 14:02	Robert A. Alsop	Deanna Kuennen;	Andy Bohlen; Marty Smith; Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0104543

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	9/5/2017 9:17	Robert A. Alsop	Deanna Kuennen; Andy Bohlen; Mark Krenik; Marty Smith	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057734
Email Message	9/5/2017 9:44	Robert A. Alsop	Deanna Kuennen; Andy Bohlen; Mark Krenik; Marty Smith	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057733
Email Message	9/7/2017 15:20	Deanna Kuennen	Robert A. Alsop;	Andy Bohlen; Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0105065
Email Message	9/7/2017 15:26	Robert A. Alsop	Deanna Kuennen;	Andy Bohlen; Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0104751

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	9/8/2017 13:42	Mark Krenik	Andy Bohlen; Robert A. Alsop;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0057726
Email Attachment	9/8/2017 13:42	Andy Bohlen	Robert A. Alsop; Mark Krenik; Deanna Kuennen;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0079964
Email Message	9/8/2017 13:46	Mark Krenik	Andy Bohlen; Robert A. Alsop;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0057725
Email Attachment	9/8/2017 14:19	Jean M. Short	Deanna Kuennen; Kim Clausen; Carole Dillerud;	Scott J. Riggs; Robert A. Alsop;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Jean M. Short; Scott J. Riggs; Robert A. Alsop) <sup>i</sup>	WITHHELD 0191573
Email Attachment	9/8/2017 14:19	Jean M. Short	Deanna Kuennen; Kim Clausen; Carole Dillerud;	Scott J. Riggs; Robert A. Alsop;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Jean M. Short; Scott J. Riggs; Robert A. Alsop) <sup>i</sup>	WITHHELD 0191575

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	9/8/2017 14:25	Jean M. Short	Deanna Kuennen; Kim Clausen; Carole Dillerud;	Scott J. Riggs; Robert A. Alsop;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Jean M. Short; Scott J. Riggs; Robert A. Alsop) <sup>i</sup>	WITHHELD 0191576
Email Message	9/8/2017 14:25	Kim Clausen	Robert A. Alsop; Scott J. Riggs;	Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0269820
Email Message	9/8/2017 14:40	Jean M. Short	Deanna Kuennen; Kim Clausen; Carole Dillerud;	Scott J. Riggs; Robert A. Alsop;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Jean M. Short; Scott J. Riggs; Robert A. Alsop) <sup>i</sup>	WITHHELD 0191572
Email Message	9/8/2017 14:40	Andy Bohlen	Robert A. Alsop; Mark Krenik; Deanna Kuennen;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0079963
Email Attachment	9/11/2017 16:50	Kim Clausen	David T. Anderson;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (David T. Anderson) <sup>i</sup>	WITHHELD 0269471

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	9/21/2017 12:16	Peter Waldock	Robert A. Alsop; Scott J. Riggs;	Jean M. Short; Deanna Kuennen; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0300531
Email Message	9/21/2017 12:44	David T. Anderson	Marty Smith; Deanna Kuennen;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (David T. Anderson) <sup>i</sup>	WITHHELD 0191645
Email Message	9/21/2017 14:39	Scott J. Riggs	Peter Waldock; Robert A. Alsop;	Jean M. Short; Deanna Kuennen; Marty Smith; Scott J. Riggs;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Scott J. Riggs; Robert A. Alsop; Jean M. Short; Scott J. Riggs) <sup>i</sup>	WITHHELD 0300530
Email Message	9/21/2017 14:46	Peter Waldock	Scott J. Riggs; Robert A. Alsop;	Jean M. Short; Deanna Kuennen; Marty Smith;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Robert A. Alsop; Jean M. Short) <sup>i</sup>	WITHHELD 0300529
Email Message	9/29/2017 9:06	Kim Clausen	Scott J. Riggs;	Deanna Kuennen;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs) <sup>i</sup>	WITHHELD 0187216

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	10/2/2017 16:20	Jean M. Short	Kim Clausen;	Scott J. Riggs;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Jean M. Short; Scott J. Riggs) <sup>i</sup>	WITHHELD 0255375
Email Message	10/2/2017 17:01	Kim Clausen	Deanna Kuennen		Attorney-Client Privileged Communication	Privilege regarding confidential communications between attorney and client extends to intermediaries and agents through whom communications are made. <sup>ii</sup>	WITHHELD 0187215
Email Message	10/2/2017 17:05	Kim Clausen	Janna Viscomi		Attorney-Client Privileged Communication	Privilege regarding confidential communications between attorney and client extends to intermediaries and agents through whom communications are made. <sup>ii</sup>	WITHHELD 0005904



Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	10/27/2017 8:15	Robert A. Alsop	Mark Krenik; Marty Smith; Deanna Kuennen;	Andy Bohlen; Doug Delesha; Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0057697
Email Attachment	11/22/2017 10:01	Jean M. Short	Kim Clausen;	David T. Anderson; Scott J. Riggs;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Jean M. Short; David T. Anderson; Scott J. Riggs) <sup>i</sup>	WITHHELD 0255245
Email Attachment	11/22/2017 10:13	Jean M. Short	Kim Clausen;	David T. Anderson; Scott J. Riggs;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Jean M. Short; David T. Anderson; Scott J. Riggs) <sup>i</sup>	WITHHELD 0255244
Email Message	11/22/2017 10:14	Jean M. Short	Kim Clausen;	David T. Anderson; Scott J. Riggs;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Jean M. Short; David T. Anderson; Scott J. Riggs) <sup>i</sup>	WITHHELD 0255243

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	11/22/2017 11:54	Kim Clausen	Jean M. Short;	David T. Anderson; Scott J. Riggs;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Jean M. Short; David T. Anderson; Scott J. Riggs) <sup>i</sup>	WITHHELD 0269585
Email Message	11/22/2017 11:58	David T. Anderson	Kim Clausen;	Jean M. Short; Scott J. Riggs;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (David T. Anderson; Jean M. Short; Scott J. Riggs) <sup>i</sup>	WITHHELD 0255223
Email Message	11/29/2017 12:25	Deanna Kuennen	Robert A. Alsop;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0201975
Email Message	11/29/2017 12:52	Robert A. Alsop	Deanna Kuennen;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0191492
Email Message	12/11/2017 15:35	Wendy Murphy	Andy Bohlen;	Tom Weidner;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Wendy Murphy; Tom Weidner) <sup>i</sup>	WITHHELD 0053951

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Message	12/11/2017 15:40	Tom Weidner	Wendy Murphy; Andy Bohlen;		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Tom Weidner; Wendy Murphy) <sup>i</sup>	WITHHELD 0072367
Email Message	4/10/2018 14:38	Marty Smith	Emma Hause	Deanna Kuennen	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Emma Hause) <sup>i</sup>	WITHHELD 02031718H1
Email Message	4/12/2018 15:43	Andy Bohlen	Robert A. Alsop;	Scott J. Riggs; Jean M. Short; Jason Severson; Tim Murray; Kevin Bushard; Andy Bohlen	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0045031
Email Attachment	5/31/2018 9:03	Jean M. Short	Darin Richardson; Brian Gaviglio; Robert A. Alsop; Tim Murray; Andy Bohlen; Scott J. Riggs		Attorney-Client Privileged Communication	Confidential communication from City Attorney (Jean M. Short; Robert A. Alsop; Scott J. Riggs) <sup>i</sup>	WITHHELD 0344167
Email Message	6/13/2018 9:34	Robert A. Alsop	Tim Murray; Andy Bohlen; Deanna Kuennen;	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0100913

Record Type	Date/Time	From	To	Other Recipients	Designation	Designation Notes	Bates Label/ Control Number
Email Attachment	6/13/2018 11:31	Tim Murray	Scott J. Riggs; Jean M. Short;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0342865
Email Message	6/13/2018 12:28	Andy Bohlen	Robert A. Alsop;	Tim Murray; Deanna Kuennen; Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0100909
Email Message	6/13/2018 12:28	Andy Bohlen	Robert A. Alsop;	Tim Murray; Deanna Kuennen; Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0118695
Email Message	6/13/2018 12:29	Andy Bohlen	Robert A. Alsop; Tim Murray;		Attorney-Client Privileged Communication	Confidential communication to City Attorney (Robert A. Alsop) <sup>i</sup>	WITHHELD 0118693
Email Message	6/13/2018 12:39	Robert A. Alsop	Andy Bohlen; Tim Murray;	Scott J. Riggs; Jean M. Short;	Attorney-Client Privileged Communication	Confidential communication from City Attorney (Robert A. Alsop; Scott J. Riggs; Jean M. Short) <sup>i</sup>	WITHHELD 0100906

IVERSON REUVERS CONDON

Dated: March 15, 2019

By 

Paul D. Reuvers, #217700

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<sup>i</sup> “The objectives of the attorney-client privilege apply to governmental clients. ‘The privilege aids government entities and employees in obtaining legal advice founded on a complete and accurate factual picture.’ 1 Restatement (Third) of the Law Governing Lawyers § 74, Comment b, pp. 573–574 (1998). Unless applicable law provides otherwise, the Government may invoke the attorney-client privilege in civil litigation to protect confidential communications between Government officials and Government attorneys.” *United States v. Jicarilla Apache Nation*, 564 U.S. 162, 169–70, 131 S. Ct. 2313, 2320–21, 180 L. Ed. 2d 187 (2011).

<sup>ii</sup> *Fagen, Inc. v. Exergy Dev. Grp. of Idaho, L.L.C.*, No. CV 12-2703 (MJD/SER), 2015 WL 12977507, at \*4 (D. Minn. June 1, 2015) (citing *Brown v. St. Paul City Ry. Co.*, 62 N.W.2d 688, 700 (Minn. 1954); and, *Northwood Nursing & Convalescent Home, Inc. v. Continental Ins. Co.*, 161 F.R.D. 293, 297 (E.D. Pa. 1995).

<sup>iii</sup> *United States v. Sindel*, 53 F.3d 874, 876 (8th Cir. 1995).